

DATE	TIME	BY	DESCRIPTION
08/14/04	0.70	PA	work on complaint against GMP; conference with M. Kuo re pleadings [<i>Apportion 0.2 related to non-assumpsit claim</i>]
08/16/04	0.50	PA	review and revise complaint [<i>Apportion 0.1 related to non-assumpsit claim</i>]
08/16/04	7.10	MFK	review Andritz's motion for temporary injunction and attached exhibits; review consent decree, contract between Andritz and GMP, and contract between Syangro and Andritz for supporting provisions in preparation of drafting complaint; draft complaint against GMP - introduction, jurisdiction, venue, factual statement, causes of action, relief, damages, and accompanying summons; review and revise draft of complaint; meeting and email with P. Alston re same and complaint issues [<i>Apportion 0.5 related to non-assumpsit claim</i>]
08/17/04	0.50	PA	work on complaint [<i>Apportion 0.1 related to non-assumpsit claim</i>]
08/17/04	2.80	MFK	meeting with P. Alston re [REDACTED], and P. Alston's comments; compile exhibits to complaint; review and revise complaint draft; email to A. Thomas re [REDACTED]; misc work re summons and filing and service of complaint
08/18/04	0.40	PA	finalize complaint [<i>Apportion 0.1 related to non-assumpsit claim</i>]
08/18/04	0.30	MFK	draft cover sheet to district court re complaint filing and summons; review and revise sheet; misc work re filing of complaint and service to GMP
08/25/04	0.10	PA	review transmittal to sheriff re service of complaint; review return of service re complaint served on GMP

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			(NO CHARGE)
08/31/04	0.10	PA	review Declaration of F. Doyle; Exhibits "A" and "B" and Declaration of J. Carmichael to A. Thomas (NO CHARGE)
09/03/04	0.20	PA	receipt and review Defendant GMP Hawaii, Inc.'s answer to complaint filed August 2, 2004
09/10/04	0.20	MFK	review GMP's answer and counterclaim; review FRCP re reply to counterclaim deadline
09/14/04	0.30	PA	email from A. Thomas; telephone call to A. Thomas re strategy for responding to counterclaim and GMP's response to Andritz
09/18/04	2.20	MFK	review GMP's counterclaim in preparation of drafting reply; draft reply to counterclaim and defenses
09/19/04	0.50	PA	review and revise answer to counterclaim
09/20/04	0.20	PA	email from and to M. Kuo re reply to counterclaim
09/22/04	0.50	PA	email to and from A. Thomas re [REDACTED]; review and finalize reply to counterclaim
09/22/04	0.40	MFK	review and revise reply to counterclaim to final for filing
09/23/04	0.10	PA	review email from M. Kuo re comments to complaint
11/06/04	1.70	MFK	draft scheduling conference statement; review and revise statement; emails to and from P. Alston on same
11/07/04	0.20	PA	email from and to M. Kuo; review and revise scheduling conference statement
11/08/04	0.20	MFK	finalize and prepare filing of scheduling conference statement

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11/17/04	0.20	PA	review rule 16 scheduling order
11/22/04	0.20	DKK	review scheduling conference order; catalog trial date
11/30/04	2.10	JB	work on preparing case, substantive pleadings, and discovery binders; work on updating substantive pleadings binder
03/03/05	0.20	PA	revise concise statement; email to and from M. Kuo
03/03/05	5.30	MFK	review Rule 56 re concise statement of facts and draft concise statement of facts; review and revise concise statement; review pleading files to compile relevant exhibits supporting material facts for concise statement
03/04/05	4.80	MFK	finalize concise statement of facts and compile exhibits and highlight relevant language for concise statement; review and revise declaration in support of concise statement of facts; calls with and letter to R. Sutton on same; meeting with P. Alston on [REDACTED]; emails to and from J. Carmichael and J. Hecht re [REDACTED]
03/16/05	0.10	PA	review minute order re continuance of settlement conference
03/17/05	0.10	PA	review concise statement filed by GMP
04/01/05	0.10	PA	review amended rule 16 scheduling order
05/09/05	0.50	MFK	calls to and with B. Bordner, T. Cook, E. Lee, and V. Devens re stipulation for appearance of C. Benedict (0.2); revise stipulation to final to include E. Lee and review and revise to final for execution and email to counsel of record regarding stipulation and execution (0.3)

DATE	TIME	BY	DESCRIPTION
05/12/05	0.90	DKK	work on settlement conference statement
05/18/05	0.20	MFK	review federal and district court rules re submission of confidential settlement statements and required content
05/23/05	0.20	MFK	draft settlement offer letter to Sutton; review and revise to final
05/24/05	0.90	MFK	draft partial factual background for settlement conference statement; calls (three) with Court re Judge's request to postpone settlement conference
06/02/05	0.20	PA	review pleadings
06/16/05	0.10	PA	review minute order re continuance of settlement conference
07/17/05	0.20	DKK	research re confidential settlement conference statement; compose email to M. Kuo & P. Alston re same
07/25/05	0.30	PA	email from and to M. Kuo re settlement conference statement; review and revise draft
07/25/05	6.70	MFK	draft confidential settlement conference statement, including [REDACTED]
07/26/05	2.00	MFK	emails from P. Alston and J. Carmicheal re [REDACTED]; revise draft to incorporate J. Carmicheal edit; review and revise draft with P. Alston's comments to final for filing; review pleading files and correspondence files to compile exhibits to settlement conference statement; identify and highlight relevant pages and materials in exhibits for settlement conference statement
07/26/05	0.00	DKK	work on exhibits for settlement conference statement (NO CHARGE)
07/27/05	0.60	MFK	email from A. Thomas re [REDACTED]; emails to and

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			from J. Carmicheal re [REDACTED]; review GMP for spreadsheet ; miscellaneous work re submission of settlement conference statement and exhibits
09/06/05	0.30	MFK	review letter from Sutton re settlement conference rescheduling; email from Debbie (Sutton's secretary on same); miscellaneous work re coordinating potential settlement confrence dates
09/29/05	0.30	MFK	review calender and federal rules re settlement conference statements and deadlines for upcoming settlement conference
10/04/05	0.20	PA	email from and to M. Kuo re settlement offer; review and revise letter
10/04/05	1.30	MFK	draft settlement offer letter to Sutton; emails with P. Alston on settlement offer and revise offer to incorporate P. Alston's edits; review letter to final
10/06/05	1.40	MFK	draft and expand facts, defenses, deposition summaries, and settlement update for first amended settlement conference statement; review and revise draft of same; email to P. Alston on same
10/07/05	0.20	PA	review and revise first amended confidential settlement conference statement; email from and to M. Kuo
10/07/05	2.20	MFK	review deposition of Wagdy Guirguis for [REDACTED]; expand and finalize confidential settlement conference statement for submission to Court; compile and highlight relevant portions of exhibits and deposition testimony in support of statement
10/11/05	0.10	PA	review court minutes re trial re-setting conference
12/02/05	5.80	MFK	review GMP's opposition to concise statement and exhibits; draft opposition to concise statement and opposing facts; review declarations, depositions, and GMP's exhibits to concise statement re timelines and

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			conflicting facts to counter sources and statements in concise statement of facts; compiled and highlight relevant text of additional exhibits in support of concise statement; meeting with P. Alston on opposition to concise statement; revise and shorten concise statement to incorporate P. Alston's comments and character limitations under rule; miscellaneous work re filing of reply and opposition to concise statement; draft and revise declaration in support of opposition to concise statement
12/04/05	0.30	MFK	review civil rules re page limitations, authorities and content, and word certification; email to A. Matsuo re errata and draft text for same
02/20/06	0.10	PA	review and revise supplemental settlement conference statement
02/20/06	2.00	MFK	draft supplemental confidential settlement conference statement; review and revise same; identify supporting exhibits on same
02/21/06	0.70	MFK	emails with N. Kanada re settlement conference statement and exhibits; finalize settlement conference statement for submission to court and review compiled exhibits to verify supporting exhibits to statement; emails with P. Alston re confidential settlement conference statement and comments re communications with GMP on settlement offer
02/21/06	0.80	NMK	prepare confidential settlement conference statement; research and compile exhibits to confidential settlement conference statement
03/03/06	0.20	PA	email from and to M. Kuo re [REDACTED]
03/09/06	0.20	PA	telephone call from M. Marsh and T. Pettit re settlement and follow up; email from and to M. Kuo

C. INTERROGATORIES, DOCUMENT PRODUCTION, AND OTHER WRITTEN DISCOVERY

DATE	TIME	BY	DESCRIPTION
11/05/04	2.90	MFK	draft initial disclosures - review pleading files, correspondence, and documents in case file for purposes of clarifying information, claims, and nature of documents for initial disclosures; meeting with P. Alston on same; revise and finalize initial disclosures for filing
11/16/04	0.30	DKK	work on case/substantive trial notebooks
11/17/04	0.30	DKK	work on case, substantive discovery trial notebooks
02/18/05	4.40	MFK	review [REDACTED]
02/22/05	0.30	PA	email from and to M. Kuo re [REDACTED]
02/23/05	0.60	MFK	emails to and from P. Alston re proposed discovery; amend proposed discovery email to incorporate P. Alston's comments and email discovery plan to A. Thomas; email to D. Kakazu re preparation of discovery requests templates and proposed discovery requests to be incorporated
02/23/05	1.80	DKK	work on drafting our 1st request for admissions, interrogatories and production of documents to GMP Hawaii, Inc.
02/24/05	0.10	PA	email from and to A. Thomas re [REDACTED]
02/24/05	0.70	MFK	review case timelines and deadlines and draft email to P. Alston summarizing key deadlines related to discovery and relevance of discovery of pending deadlines
02/24/05	0.10	DKK	confer with M. Kuo re [REDACTED]
03/05/05	0.20	PA	email regarding discovery and disclosure obligations

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03/09/05	0.10	DKK	emails back & forth with M. Kuo and P. Alston re [REDACTED]
03/10/05	0.10	PA	email to A. Thomas re [REDACTED]; email re disclosure of experts; review motion documents
03/10/05	0.90	DKK	work on expert disclosure
03/11/05	0.00	PA	email from A. Thomas re [REDACTED]; email to M. Kuo (NO CHARGE)
03/16/05	0.20	PA	telephone calls from and to auditor re disclosures
03/21/05	0.20	PA	work on discovery
03/22/05	0.20	PA	review request for production of documents
03/23/05	2.30	MFK	review GMP's request for production of documents; draft Synagro's first request for production of documents, including instruction and definitions, to GMP; review and revise draft of production request
03/23/05	0.20	DKK	emails back & forth with A. Matsuo & M. Kuo re [REDACTED]
03/24/05	0.00	PA	review and revise notice of taking 30(b)(6) deposition re GMP Hawaii (NO CHARGE)
03/24/05	1.90	MFK	review and revise to final request for production of documents for filing; draft 30(b)(6) deposition notice, including instructions, definitions, and exhibit A on deposition subjects; review and revise deposition notice
03/28/05	0.30	MFK	finalize 30(b)(6) deposition notice for service; call with P. Alston re deposition date
03/29/05	0.10	DKK	work on drafting our response to GMP's 1st request for production of documents

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03/31/05	0.20	MFK	calls to and from J. Carmicheal on [REDACTED]
04/05/05	0.10	MFK	call from J. Carmicheal re responsive document and meeting to discuss documents requiring redaction
04/06/05	1.10	DKK	work on objections to GMP's 1st request for production of documents
04/12/05	0.10	MFK	email and call from J. Carmicheal re [REDACTED]; email to D. Kakazu on production of same
04/12/05	0.00	DKK	coordinate client's documents for production in response to discovery requests (NO CHARGE)
04/13/05	2.00	MFK	review scope of GMP's request for production; review draft from D. Kakazu of Synagro's response to GMP's production of documents; revise preliminary statement and general objections; review and expand objections for each request and draft responses for document requests; email to D. Kakazu re [REDACTED]
04/13/05	0.40	DKK	work on document production
04/14/05	5.20	MFK	review and revise Synagro's responses to final draft and [REDACTED]; review pleading and correspondence files to identify documents and correspondence responsive to GMP's request for production and documents related to Synagro's initial disclosures; review documents produced by Synagro (documents from Kirk Lucas and Alvin Thomas) in response to GMP's production request and identify responsive and privileged documents
04/15/05	0.20	PA	email from and to M. Kuo re [REDACTED]; review responses
04/15/05	3.00	MFK	emails to and from P. Alston on [REDACTED]; finalize responses for service to GMP; continue review of document from Synagro (main documents) for

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			[REDACTED]; organize responsive documents to correspond to GMP's requests; call to J. Carmicheal (left message) re [REDACTED]
04/15/05	0.50	DKK	work on reviewing documents for production
04/16/05	0.70	MFK	review and organize documents in production for redaction and assertion of privilege and identify relevant privileges for log; chronologically organize responsive document for production and to identify duplicates; email to P. Alston on documents for production and questions on specific documents regarding responsiveness and privilege
04/17/05	2.10	PA	review and respond to email from M. Kuo re document production; review documents from client
04/18/05	0.20	PA	email from and to M. Kuo re client's documents
04/18/05	0.80	MFK	emails to and from P. Alston on [REDACTED]; meeting with P. Alston on [REDACTED]; incorporate duplicate documents into respective production folders
04/18/05	0.90	DKK	work on client's documents for production
04/18/05	0.50	JB	work on processing client documents for document notation
04/19/05	1.40	MFK	compare drafts of memorandum of understanding regarding sand island and honouliuli projects to final version; calls (two) with J. Carmicheal re [REDACTED]; draft email to J. Carmicheal [REDACTED]; meeting with P. Alston on [REDACTED]
04/19/05	0.40	DKK	work on client' documents for production; confer with M. Kuo re same
04/20/05	1.10	MFK	emails to and from J. Carmicheal re [REDACTED];